RECORD OF WATER WELL

State Form 35680 (R4 / 4-92)

Mail complete record within 30 days to:
INDIANA DEPARTMENT OF NATURAL RESOURCES
Division of Water
402 W.Washington St., Rm. W264
Indianapolis, IN 46204
(317) 232-4160

Fill in completely

WELL LOCATION

County where drilled	Civil township	Township	Range	Section
LAKE	CALUMET	37 N	9W	36

Driving directions to the well location (include county road names, number, subdivision lot number with consideration to intersecting road and trip origination). There is space for a map on reverse side.

INTERSTATE 90 W TO 5912 N TO 312 E TO INDUSTRIAL HWY (US12) TO 6499 INDUSTRIAL HWY.

SW

OWNER - CONTRACTOR

Name of well owner: CCCI
Telephone number:

Address (number and street, city, state, ZIP code): 6499 INDUSTRIAL HWY GARY, IN 46406

Name of ~~building~~ contractor: KPR & ASSOCIATES - SITE MANAGERS
Telephone number:

Address (number and street, city, state, ZIP code):

Name of drilling contractor: TOP FLIGHT ENVIRONMENTAL DRILLING SERVICES
Telephone number: 219-257-8696

Address (number and street, city, state, ZIP code): 3505 N HOME SUITE 101 MISHAWAKA IN 46545

Name of equipment operator: MACK CLARK
License number: 1728
Date of completion: 12/15/99

CONSTRUCTION DETAILS

Use of well: ☐ Home ☐ Public supply ☐ Industry ☐ Stock ☐ Test ☒ Other (specify): MONITOR WELL ☐ Irrigation

Method of drilling: ☐ Rotary ☐ Cable tool ☐ Jet ☐ Rev. rotary ☐ Bucket rig ☒ Other HSA

Casing length: feet | Material: 304 SS | Diameter: 2 inches

Screen length: feet | Material: 304 SS | Diameter: 2 inches

Screen slot size: | Total depth of well:

Depth of pump setting: | Water quality (clear, cloudy, odor, etc.):

Type of pump: ☐ Submersible ☐ Shallow-well jet ☐ Deep-well jet ☐ Other (specify):

WELL CAPACITY TEST

Check one: ☐ Bailing ☐ Air ☐ Pumping

Test rate: ______ gpm ______ hrs.

Drawdown: feet

Static level (depth of water) N/A feet

WELL LOG

FORMATIONS: Type of material	From (feet)	To (feet)

(Additional space for well log on reverse side)

GROUTING INFORMATION

Grout material: | Depth of grout From to

Method of installation: | Number of bags used:

WELL ABANDONMENT

Sealing material: VOLCLAY GROUT | Depth filled From 24 To 2

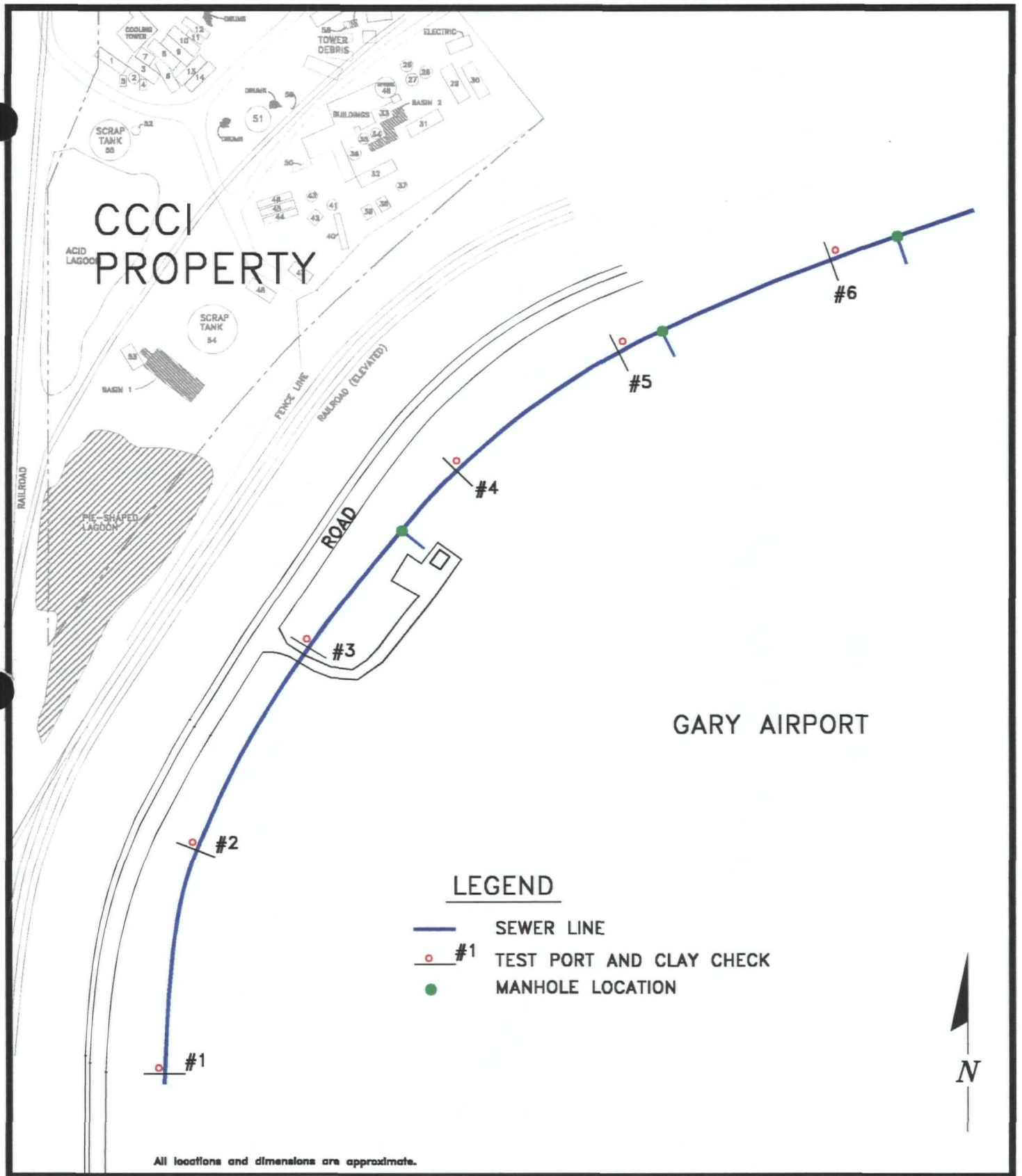
Method of installation: TREMIE | Number of bags used:

I hereby swear or affirm, under the penalties of perjury that the information submitted herewith is to the best of my knowledge and belief, true, accurate and complete.

Signature of owner or authorized representative: [signature]

Date: 12/26/99

APPENDIX K



All locations and dimensions are approximate.

ENVIRONMENTAL CONSULTATION & REMEDIATION

KRUKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

KPR

414 Plaza Drive, Suite 106 Westmont Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

1056 Killarney Drive Dyer, Indiana 46311 Telephone 219-865-6848 Facsimile 219-865-8587

GARY/CHICAGO AIRPORT SEWER DIAGRAM

Conservation Chemical Company
6499 Industrial Highway
Gary, Indiana

Scale: 1" = 120'	Date: January, 2002
KPR Project No. 17094	APPENDIX K

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

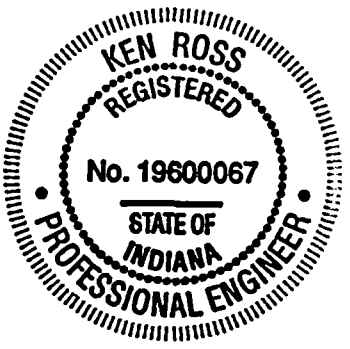
IN THE MATTER OF:	)	
CONSERVATION CHEMICAL CO.	)	
OF ILLINOIS, INC.,	)	Docket No. V-W-98-C-497
GARY, INDIANA	)	

CERTIFICATION OF ENGINEER
REGARDING AMENDED AOC

We do, hereby, certify that the plans and specifications for installation of the culvert required by the Amended Order in the above-captioned case were prepared in accordance with all applicable FAA and Gary/Chicago Authority requirements for construction on airport facilities. We further certify that the completion of the work and installation of the culvert system were also completed in accordance with the aforementioned requirements.

Dated: 12/15/01

Signed: K~ R~ P.E.
Ken Ross



APPENDIX L

Photo 1 - View of site looking north prior to any of KPR's remedial activities.

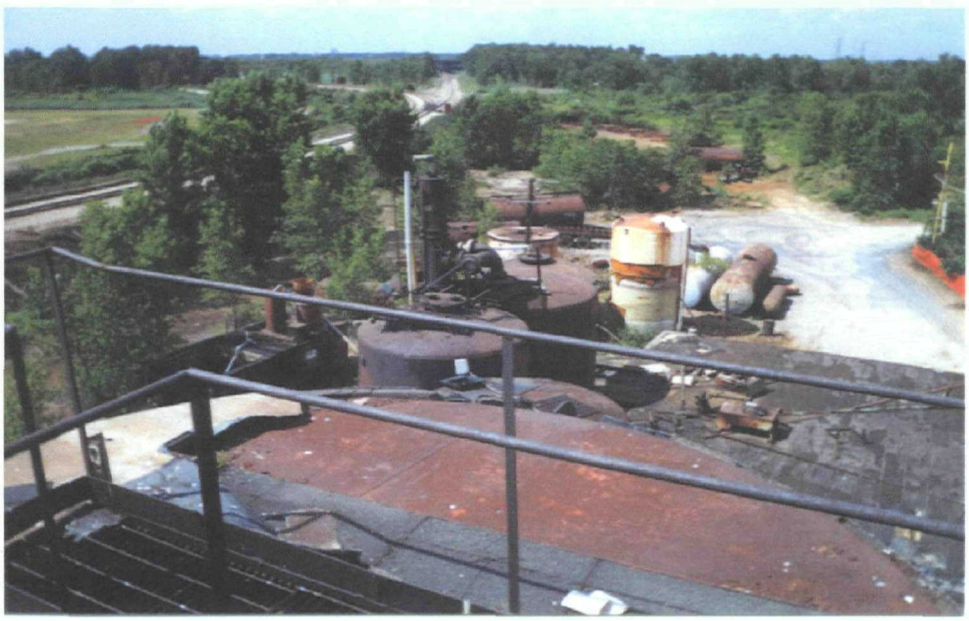


Photo 2 - View of site looking west prior to any remedial activities.

Photo 3 - View of site looking southeast in July of 1999.

Photo 4 - Basin 1 during initial stages of site activities.

Photo 5 - Demolition of wooden cooling tower. Orphaned drums in foreground.

Photo 6 - Demolition and shearing of Tank No. 56.

Photo 7 - Cutting of metal from former cracking tower.

Photo 8 - Demolition of building on-site.

Photo 9 - Hazcat sampling of aboveground orphaned drums.

Photo 10 - Initial sampling of pie-shaped lagoon.

Photo 11- Sampling of potential ACM.

Photo 12 - Restricted area around Tank No. 14 because of ACM coating.

Photo 13 - Interior cleaning of Tank No. 40.

Photo 14 - Shearing of cleaned tanks.

Photo 15 - Labeling of drummed hazardous waste materials from tanks.

Photo 16 - Typical test pit trench with no subsurface impediments.

Photo 17 - Cleaned tanks staged for shearing. (Note base of Tank No. 56 at right.)

Photo 18 - Lowering of a vertical acid tank.

Photo 19 - Backfilling of Basin 2.

Photo 20 - Pressure grouting for closure of monitoring well.

Photo 21 - Labpack of hazardous chemicals.

Photo 22 - Excavation of soils from Tank No. 51 area.

Photo 23 - Excavation of buried drums near former wooden cooling tower.

Photo 24 - Excavated drum debris staged in non-hazardous (front) and hazardous (back) piles.

Photo 25 - Loading hazardous drum debris for off-site disposal.

Photo 26 - Stabilizing of Basin 1 materials with cement kiln dust.

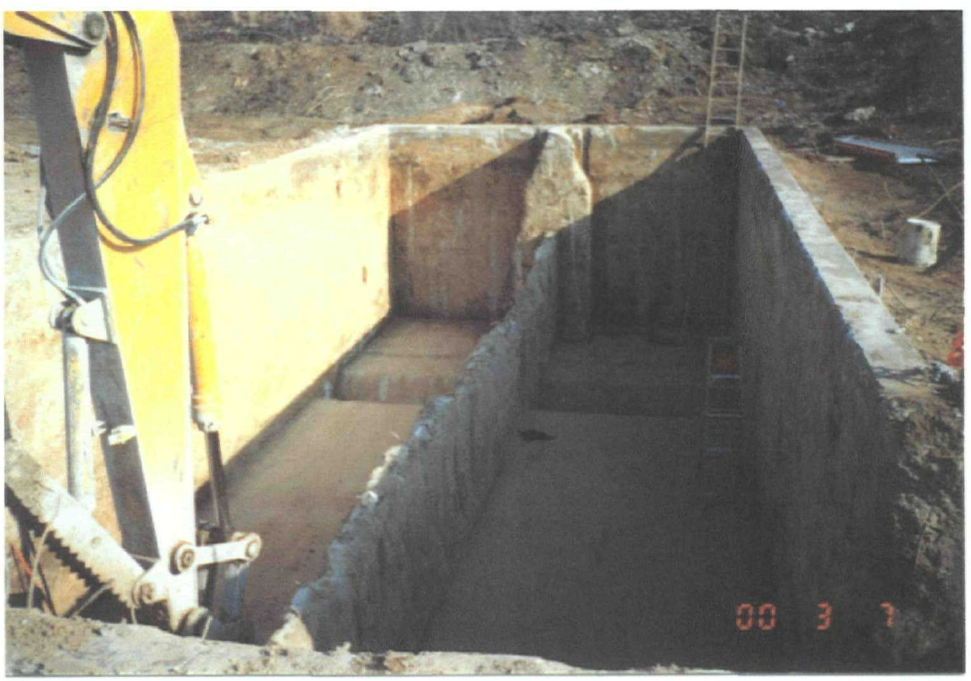


Photo 27 - Basin 1 after cleaning.

Photo 28 - View of Basin 1 after backfilling.

Photo 29 - View of sludge in off-site lagoon prior to stabilization.

Photo 30 - Stabilized material from pie-shaped lagoon.

Photo 32 - View of site looking northeast in March, 2000.

Photo 33 - View of stone lined bottom and packed side slopes of off-site lagoon after all stabilized material had been removed.

APPENDIX M

Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

July 20, 1999

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Lagoon Sludge Materials Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the lagoon sludge materials from the CCCI project, which were prepared and analyzed by Test America laboratory of Bartlett, Illinois was reviewed per Level II requirements. The analyses included USEPA SW-846 for Toxicity Characteristic Leaching Procedures by Method 1311 for RCRA metals by Series 6000/7000 and Polychlorinated Biphenyls (PCBs) by Method 8082.

The data package received contained analytical results for 20 samples and a Level II Quality Control (QC) Report.

The data was evaluated using the information obtained in the QC report regarding the following parameters: holding times, continuing calibration, blanks, system monitoring compounds (surrogates), matrix spikes/matrix spike duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical method.

The samples were extracted and analyzed within the sample method holding times. The continuing calibration verification is within the percent recovery requirements. The blank analysis report showed analytical results less than detectable limits. The blank surrogate recovery is within the acceptable recovery limits. The laboratory control standard sample with its associated surrogates was with in the acceptable recovery limits.

The matrix spike (MS) and matrix spike duplicate (MSD) showed acceptable recoveries for all analytes except for chromium (ICP) and PCBs which were diluted out. The relative percent difference between the MS/MSD should be less than 20 percent and the MS/MSD falls within the acceptance criteria for those analytes recovered.

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In reviewing the analytical results for individual samples there were several that the PCB analysis were found to have system monitoring compounds that were not within the acceptance criteria. Recoveries were below acceptable limits (primarily due to surrogates being diluted out) . These samples identified by laboratory number were as follows:

532900	532901	532902	532903	532904
532905	532906	532907	532908	532909
532910	532911	532918		

In these cases, the associated positive sample results and detection limits/non-detects should be evaluated as estimated.

Additionally, individual sample results indicated elevated reporting limits due to matrix interferences for the following specific analytical parameters and samples:

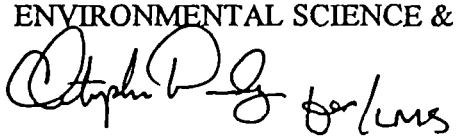
Barium:	532900	532901	532904	532906
	532907	532911	532913	532914
	532915	532916	532917	
Arsenic:	532907	532908		
Cadmium:	532912	532913		

In these cases, the associated positive sample results and detection limits/non-detects should be evaluated as estimated.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC. (Formerly QST Environmental)



Lana M. Smith
Sr. Project Scientist

Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

March 10, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Off-Site Lagoon Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the off-site lagoon samples from the CCCI project, which were prepared and analyzed by Test America laboratory of Bartlett, Illinois was reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICAP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; and total solids by Method 2540.

The data package received contained analytical results for 3 samples and a Level II Quality Control (QC) Report. The samples are listed below.

CCCI/LS/Off-Site Closure/5-1
CCCI/LS/Off-Site Closure/5-1D
CCCI/LS/Off-Site Closure/6-1

The data was evaluated using the information obtained in the QC report regarding the following parameters: holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

The samples were extracted and analyzed within the specific analytical methods holding times.

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The continuing calibration verification (CCV) appears within the percent recovery/percent difference requirements for the analytes.

The blank analysis report showed analytical results less than detectable limits. The laboratory control standard samples were within acceptable recovery limits.

The duplicate analysis results for total solids were within the acceptance criteria of <20% relative percent difference (RPD).

The matrix spike (MS) and matrix spike duplicate (MSD) had acceptable percent recoveries. No qualifying action or additional comments are noted for the PCBs based on the MS/MSD data alone.

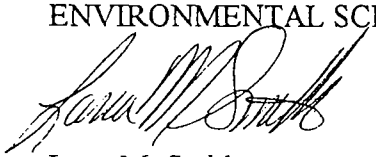
The matrix spike (MS) and matrix spike duplicate (MSD) showed acceptable recoveries for all analytes. Additionally the relative percent difference (RPD) between the MS/MSDs reported fell within the acceptance criteria of less than 20%. No qualifying action or comments are noted based on the MS/MSD data.

Although validation guidelines do not provide qualification of data based on field duplicates the field duplicates were reviewed per the following criteria. The field duplicate pair was evaluated using a 20% RPD for sample values greater than five (5) times the reporting limit and a plus or minus two (2) times the reporting limit control when one or both sample results in the pair were less than five (5) times the reporting limit. Field duplicate pair evaluation of the samples CCCI/LS/Off-Site Closure/5-1 and CCCI/LS/Off-Site Closure/5-1D for analysis performed were within these review criteria.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.



Lana M. Smith
Sr. Project Scientist

Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

May 10, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Off-Site Closure and Acid Lagoon Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the off-site closure and acid lagoon samples from the CCCI project, which were prepared and analyzed by Test America of Bartlett, Illinois were reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICAP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; and total solids by Method 2540.

The data package received contained analytical results for 8 samples and a Level II Quality Control (QC) Report. The samples are listed below.

CCCI/LS/Acid Lagoon/9-1
CCCI/LS/Acid Lagoon/10-1
CCCI/LS/Acid Lagoon/11-1
CCCI/LS/Acid Lagoon/12-1
CCCI/LS/Acid Lagoon/10-1D
CCCI/LS/Off-Site Closure/7-1
CCCI/LS/Off-Site Closure/7-1D
CCCI/LS/Off-Site Closure/8-1

The data was evaluated using the information obtained in the QC report regarding the following parameters: chain of custody, holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

Chain of Custody (COC) documentation for the off-site closure samples recorded by the laboratory showed an arrival temperature of 18°C for the samples. The laboratory noted that the samples arrived with no ice. Soil samples are to be preserved by ice to 4°C. No qualifying action

3199 Riverport Tech Center Drive, St. Louis, MO 63043
314.209.5900, Fax 314.209.5929, www.eseworld.com

or additional comments are noted based on this information. No COC documentation was provided for the acid lagoon samples in the QC report.

The samples were extracted and analyzed within the specific analytical methods holding times.

The continuing calibration verification (CCV) appears within the percent recovery/percent difference requirements for the analytes.

The blank analysis report showed analytical results less than detectable limits. The laboratory control standard samples were within acceptable recovery limits.

The duplicate analysis results for total solids were within the acceptance criteria of <20% relative percent difference (RPD).

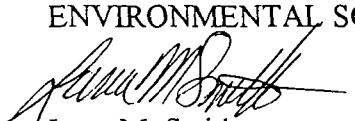
The matrix spike (MS) and matrix spike duplicate (MSD) results for the acid lagoon samples showed acceptable recoveries for the TCLP chromium ICAP analysis. Additionally the relative percent difference (RPD) between the MS/MSD reported fell within the acceptance criteria of less than 20%. No MS/MSDs information was provided for the off-site closure samples in the QC report therefore it cannot be verified that the QC was performed at the required frequency for the analysis.

Although validation guidelines do not provide qualification of data based on field duplicates the field duplicates were reviewed per the following criteria. The field duplicate pairs were evaluated using a 20% RPD for sample values greater than five (5) times the reporting limit and a plus or minus two (2) times the reporting limit when one or both sample results in the pair were less than five (5) times the reporting limit. Field duplicate pair evaluation of the samples CCCI/LS/Off-Site Closure/7-1 and CCCI/LS/Off-Site Closure/7-1D for analysis performed were within this review criteria with the exception of hexavalent chromium that exceeded the criteria. Field duplicate pair evaluation of the samples CCCI/LS/Acid Lagoon/10-1 and CCCI/LS/Acid Lagoon/10-1D for analysis performed were within this review criteria with the exception of hexavalent chromium and TCLP ICAP chromium that exceeded the criteria. These differences in the RPDs may be due to the non-homogeneous nature of the soil samples. Further evaluation of field duplicate RPD should be based upon project specific quality assurance requirements.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.



Lana M. Smith
Sr. Project Scientist

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Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

May 10, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Pie Lagoon Closure and Pie Shape Closure Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the pie lagoon closure and pie shape closure samples from the CCCI project, which were prepared and analyzed by Test America of Bartlett, Illinois were reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICAP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; and total solids by Method 2540.

The data package received contained analytical results for 8 samples and a Level II Quality Control (QC) Report. The samples are listed below.

CCCI/LS/Pie Lagoon Closure/13-1
CCCI/LS/Pie Lagoon Closure/14-1
CCCI/LS/Pie Lagoon Closure/15-1
CCCI/LS/Pie Lagoon Closure/16-1
CCCI/LS/Pie Lagoon Closure/17-1
CCCI/LS/Pie Lagoon Closure/17-1D
CCCI/LS/Pie Lagoon Closure/18-1
CCCI/LS/Pie Lagoon Closure/19-1
CCCI/LS/Pie Lagoon Closure/20-1
CCCI/LS/Pie Lagoon Closure/21-1
CCCI/LS/Pie Lagoon Closure/22-1

CCCI/LS/Pie Shape Closure/13-2
CCCI/LS/Pie Shape Closure/14-2
CCCI/LS/Pie Shape Closure/15-2
CCCI/LS/Pie Shape Closure/16-2
CCCI/LS/Pie Shape Closure/17-2
CCCI/LS/Pie Shape Closure/17-2D

The data was evaluated using the information obtained in the QC report regarding the following parameters: chain of custody, holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

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RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

Chain of Custody (COC) documentation for the pie lagoon closure and pie shape closure samples recorded by the laboratory showed an arrival temperature of 15°C and 22°C for the samples respectively. The laboratory noted that the samples arrived with no ice. Soil samples are to be preserved by ice to 4°C. No qualifying action or additional comments are noted based on this information.

The samples were extracted and analyzed within the specific analytical methods holding times.

The continuing calibration verification (CCV) was provided for the TCLP ICAP chromium and appears to be within the percent recovery/percent difference requirements for the analysis. The CCV information for the other analyses was not provided and therefore can not be verified.

The blank analysis report showed analytical results less than detectable limits. The laboratory control standard samples were within acceptable recovery limits.

The duplicate analysis results for total solids was not provided in the QC report and therefore can not be verified to be within the acceptance criteria of <20% relative percent difference (RPD) for the analysis.

The matrix spike (MS) and matrix spike duplicate (MSD) results for the pie shaped closure samples showed acceptable recoveries for the TCLP chromium ICAP analysis. However, no duplicate spike information was received. No MS/MSDs information was provided for the pie lagoon closure samples in the QC report therefore it cannot be verified that the QC was performed at the required frequency for the analysis.

Although validation guidelines do not provide qualification of data based on field duplicates the field duplicates were reviewed per the following criteria. The field duplicate pairs were evaluated using a 20% RPD for sample values greater than five (5) times the reporting limit and a plus or minus two (2) times the reporting limit when one or both sample results in the pair were less than five (5) times the reporting limit. Field duplicate pair evaluation of the samples CCCI/LS/Pie Lagoon/17-1 and CCCI/LS/Pie Lagoon Closure/17-1D for analysis performed were within this review criteria with the exception of TCLP ICAP chromium that exceeded the criteria. The TCLP ICAP chromium had a RPD of approximately 48%. This large RPD may be due to the non-homogeneous nature of the soil samples. Field duplicate pair evaluation of the samples CCCI/LS/Pie Shaped Closure/17-2 and CCCI/LS/Pie Shaped Closure/17-2D for analysis performed were within this review criteria. Further evaluation of field duplicate RPD should be based upon project specific quality assurance requirements.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Lana M. Smith
Sr. Project Scientist

Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

July 1, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Pie Lagoon Closure and LS Closure Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the pie lagoon closure and LS closure samples from the CCCI project, which were prepared and analyzed by Test America of Bartlett, Illinois were reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICAP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; and total solids by Method 2540.

The data package received contained analytical results for three sets of data with two samples in each set and a respective Level II Quality Control (QC) Report, with the exception of one set. The set containing the samples, CCCI/LS/Pie Lagoon/15-3/Closure and CCCI/LS/Pie Lagoon/15-3D/Closure did not have a QC Report provided. The other two sets containing QC Reports were reviewed and the samples are listed below.

CCCI/Pie Lagoon 16-4/Closure	CCCI/LS/14-4/Closure
CCCI/Pie Lagoon 16-4 Dup/Closure	CCCI/LS/14-4 Dup/ Closure

The data was evaluated using the information obtained in the QC report regarding the following parameters: chain of custody, holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

3199 Riverport Tech Center Drive, St. Louis, MO 63043
314.209.5900, Fax 314.209.5929, www.escworld.com

Chain of Custody (COC) documentation for the pie lagoon closure and LS closure samples recorded by the laboratory showed an arrival temperature of room temperature and 17°C for the samples respectively. The laboratory noted that the samples arrived with no ice. Soil samples are to be preserved by ice to 4°C. No qualifying action or additional comments are noted based on this information.

The samples were extracted and analyzed within the specific analytical methods holding times.

The continuing calibration verification (CCV) was provided and appears to be within the percent recovery/percent difference requirements for the analysis.

The blank analysis report showed analytical results less than the detectable limits. The QC report contained no information on the blanks for the pie lagoon samples total solids analysis. The laboratory control standard samples were within acceptable recovery limits.

The duplicate analysis results for total solids was not provided in the QC report for the pie lagoon closure samples and therefore verification of the proper frequency or acceptance criteria of <20% relative percent difference (RPD) for the analysis could not be determined. The LS closure samples duplicate analysis results for total solids were within the acceptance criteria of <20% relative percent difference (RPD).

The matrix spike (MS) and matrix spike duplicate (MSD) results for the samples showed acceptable recoveries for the TCLP chromium ICAP analysis. Additionally the relative percent difference (RPD) between the MS/MSD reported fell within the acceptance criteria of less than 20%. The matrix spike (MS) and matrix spike duplicate (MSD) did not show acceptable percent recoveries for hexavalent chromium. The hexavalent chromium MS percent recovery was 59.5%, which is not within the acceptance criteria of 75-125%. The RPD between the hexavalent chromium MS/MSD was 24.8%, which is above the acceptance criteria of 20%. No qualifying action or additional comments are noted for the samples based on the MS/MSD data alone.

Although validation guidelines do not provide qualification of data based on field duplicates the field duplicates were reviewed per the following criteria. The field duplicate pairs were evaluated using a 20% RPD for sample values greater than five (5) times the reporting limit and a plus or minus two (2) times the reporting limit when one or both sample results in the pair were less than five (5) times the reporting limit. Field duplicate pair evaluation of the samples CCCI/Pie Lagoon 16-4/Closure and CCCI/Pie Lagoon16-4 Dup/Closure for analysis performed were within this review criteria with the exception of hexavalent chromium that exceeded the criteria. The sample differences being greater than plus or minus two (2) times the reporting limit may be due to the non-homogeneous nature of the soil samples. Field duplicate pair evaluation of the samples CCCI/LS/14-4/Closure and CCCI/LS/14-4 Dup/Closure for analysis performed were within this review criteria. Further evaluation of field duplicate RPD should be based upon project specific quality assurance requirements.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Lana Smith /by Christopher D—J

Lana M. Smith
Sr. Project Scientist

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Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

August 2, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Pie Lagoon Closure Samples (Cells 13 and 17) Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the pie shaped lagoon closure samples (Cells 13 and 17) from the CCCI project, which were prepared and analyzed by Test America of Bartlett, Illinois were reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; total solids by Method 2540 and pH by Method 9045.

The data package received contained analytical results for two sets of data with two samples in the first set and three samples in the second set. Each set contained a Level II Quality Control (QC) Report. The samples are listed below.

Set 1
- CCCI/Pie Lagoon Closure/13-6
- CCCI/Pie Lagoon Closure/13-6D

Set 2
- CCCI/Pie Lagoon/13-4/Closure
- CCCI/Pie Lagoon/17-4/Closure
- CCCI/Pie Lagoon/17-4D/Closure

The data was evaluated using the information obtained in the QC report regarding the following parameters: chain of custody, holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

3199 Riverport Tech Center Drive, St. Louis, MO 63043
314.209.5900, Fax 314.209.5929, www.eseworld.com

Chain of Custody (COC) documentation for Data Set 1 and Data Set 2 samples recorded by the laboratory showed an arrival temperature of 9°C and 12°C for the sets respectively. The laboratory noted that all the samples arrived with ice. Soil samples are to be preserved by ice to 4°C. No qualifying action or additional comments are noted based on this information.

The samples for both data sets were extracted and analyzed within the specific analytical methods holding times.

The continuing calibration verification (CCV) for Data Set 1was provided for the TCLP ICP chromium and hexavalent chromium and both appear to be within the percent recovery/percent difference requirements. The continuing calibration verification (CCV) for Data Set 2 was provided for the hexavalent chromium and appears to be within the percent recovery/percent difference requirements for the analysis. The CCV information for the TCLP ICP chromium analysis for Data Set 2 was not provided and therefore can not be verified.

The blank analysis report for both data sets showed analytical results less than the detectable limits. The laboratory control standard samples for both data sets were within acceptable recovery limits.

The duplicate analysis results for total solids and pH were within the acceptance criteria of <20% relative percent difference (RPD) for both data sets.

Data Set 1 matrix spike (MS) and matrix spike duplicate (MSD) results for the samples showed acceptable recoveries for the TCLP chromium ICP analysis. Additionally the relative percent difference (RPD) between the MS/MSD reported fell within the acceptance criteria of less than 20. No MS/MSD information was provided for the hexavalent chromium analysis in the QC report therefore it could not be verified that the QC was performed at the required frequency for that analysis. No qualifying action or additional comments are noted for the samples based on the MS/MSD data alone.

Data Set 2 matrix spike (MS) and matrix spike duplicate (MSD) results did not show acceptable percent recoveries for hexavalent chromium. The hexavalent chromium MS/MSD percent recoveries were 5.1% and 7.0% respectively, which are not within the acceptance criteria of 75-125%. The RPD between the hexavalent chromium MS/MSD was 26.7%, which is above the acceptance criteria of 20%. No MS/MSD information was provided for the TCLP chromium ICP analysis in the QC report therefore it could not be verified that the QC was performed at the required frequency for that analysis. No qualifying action or additional comments are noted for the samples based on the MS/MSD data alone.

Although validation guidelines do not provide qualification of data based on field duplicates the field duplicates were reviewed per the following criteria. The field duplicate pairs were evaluated using a 20% RPD for sample values greater than five (5) times the reporting limit and a plus or minus two (2) times the reporting limit when one or both sample results in the pair were less than five (5) times the reporting limit. Field duplicate pair evaluation of the samples CCCI/Pie Lagoon

Closure/13-6 and CCCI/Pie Lagoon Closure/13-6D from Data Set1 for the analyses performed were within this review criteria. Field duplicate pair evaluation of the samples CCCI/Pie Lagoon/17-4/Closure and CCCI/Pie Lagoon/17-4D/Closure from Data Set 2 for analyses performed were also within this review criteria. Further evaluation of field duplicate RPD should be based upon project specific quality assurance requirements.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Lana Smith/cms

Lana M. Smith
Sr. Project Scientist

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Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

January 10, 2000

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Test Pit Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the test pit samples from the CCCI project, which were prepared and analyzed by Test America laboratory of Bartlett, Illinois was reviewed per Level II requirements. The analyses included USEPA SW-846 for Toxicity Characteristic Leaching Procedures (TCLP) Method 1311 for Semi-Volatile Organic Compounds (SVOCs) by Method 8270B, Volatile Organic Compounds (VOCs) by Method 8260B, and RCRA metals by Series 6000/7000. In addition, analysis included Polychlorinated Biphenyls (PCBs) by Method 8082, total solids by Method 2540 and total cyanide by Method 9012A.

The data package received contained analytical results for 14 samples and a Level II Quality Control (QC) Report. The samples are listed below.

CCCI/TP-2-1 (6-7')	CCCI/TP-5-1 (7')	CCCI/TP-6-1 (7')
CCCI/TP-7-1 (7')	CCCI/TP-8-1 (7')	CCCI/TP-9-1 (7')
CCCI/TP-10-1 (2-3')	CCCI/TP-12-1 (3-4')	CCCI/TP-TB-1
CCCI/TP-13-1 (7')	CCCI/TP-11-1 (4-6')	CCCI/TP-13-1 (7')Dup
CCCI/TP-14-1 (3-4')	CCCI/TP-14-2 (7')	

The data was evaluated using the information obtained in the QC report regarding the following parameters: holding times, continuing calibration, blanks, surrogates, matrix spikes/matrix spike duplicates, duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

3199 Riverport Tech Center Drive, St. Louis, MO 63043
314.209.5900, Fax 314.209.5929, www.eseworld.com

The samples were extracted and analyzed within the specific analytical methods holding times.

The continuing calibration verification (CCV) appears within the percent recovery/percent difference requirements for the analytes.

The blank analysis report showed analytical results less than detectable limits. The laboratory control standard samples were within acceptable recovery limits.

The duplicate analysis results for total solids were within the acceptance criteria of <20% relative percent difference (RPD).

The matrix spike (MS) and matrix spike duplicate (MSD) did not show acceptable percent recoveries for TCLP cadmium and PCBs. The TCLP cadmium MS/MSD percent recoveries were 62.0% and 58.0% respectively, which are not within the acceptance criteria of 75-125%. In the case of the TCLP cadmium the associated positive sample results and detection limits/non-detects should be evaluated or considered as estimated values. The PCBs MS/MSD percent recoveries were 129.5% and 127.4% respectively, which are not within the acceptance criteria of 75-125%. No qualifying action or additional comments are noted for the PCBs based on the MS/MSD data alone.

PCB surrogate recoveries for samples CCCI/TP-12-1 (3-4'), CCCI/TP-14-1 (3-4'), and CCCI/TP-14-2 (7') were not within acceptable recovery limits. The recovery limits for the surrogates are as follows: tetrachloroxylene (TCX), 59-118%; decachlorobiphenyl (DCB), 55-132%. The surrogates for these three samples were diluted out, therefore there were no percent recoveries reported. In this case the associated positive sample results and detection limits/non-detects should be evaluated or considered as estimated values.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Lana M. Smith
Sr. Project Scientist

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Environmental Science &
Engineering, Inc.
A MACTEC COMPANY

August 30, 1999

Mr. David Pyles
Krikau Pyles Rysiewicz and Associates, Inc.
414 Plaza Drive, Suite 106
Westmont, Illinois 60559

Review of the Conservation Chemical Company of Illinois (CCCI) Cooling Tower Samples Analytical Data Reported by Test America, Inc.

Dear Mr. Pyles:

As requested, analytical data for the cooling tower samples from the CCCI project, which were prepared and analyzed by Test America laboratory of Bartlett, Illinois was reviewed per Level II requirements. The analyses included USEPA SW-846 for chromium by Inductively Coupled Plasma-Atomic Emission Spectrometry (ICAP) Method 6010B and Toxicity Characteristic Leaching Procedures (TCLP) Method 1311; hexavalent chromium by Method 3060; and total solids by Method 2540.

The data package received contained analytical results for 12 samples and a Level II Quality Control (QC) Report. The samples are listed below.

CCCI/CT-S-1-1	CCCI/CT-S-1-2	CCCI/CT-S-2-1
CCCI/CT-S-2-2	CCCI/CT-S-3-1	CCCI/CT-S-3-2
CCCI/CT-S-4-1	CCCI/CT-S-4-2	CCCI/CT-S-5-1
CCCI/CT-S-5-2	CCCI/VT-S-6-1	CCCI/PIT-S-7-1

The data was evaluated using the information obtained in the QC report regarding the following parameters: holding times, continuing calibration, blanks, matrix spikes/matrix spike duplicates, and laboratory control samples.

RESULTS

Based upon the information provided, the data reviewed meets the quality assurance/quality control requirements of the parameters reviewed for the analytical methods with the following notes.

The samples were extracted and analyzed within the specific analytical methods holding times.

11665 Lilburn Park Road, St. Louis, MO 63146-3535
314.567.4600, Fax 314.567.5030, www.eseworld.com

The continuing calibration verification (CCV) appears within the percent recovery/percent difference requirements for all analytes.

The blank analysis report showed analytical results less than detectable limits. The laboratory control standard sample was within acceptable recovery limits.

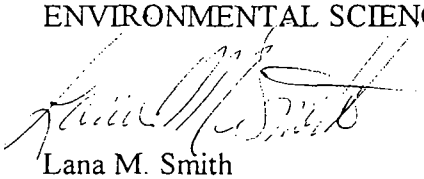
The duplicate analysis results for total solids were within the acceptance criteria of <20% relative percent difference (RPD).

The matrix spike (MS) and matrix spike duplicate (MSD) did not show acceptable percent recoveries for chromium by ICAP analysis. The chromium MS/MSD percent recoveries were 38.0% and 32.0% respectively, which were below the acceptance criteria of 75%. The MD/MSD RPD that were reported were within the acceptance criteria of less than 20 percent. No qualifying action or additional comments are noted based on the MS/MSD data since the matrix spike samples may not be from this job.

If you have any questions or require further information in regard to this data review, please do not hesitate to contact me.

Sincerely yours,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.



Lana M. Smith
Sr. Project Scientist

APPENDIX N

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

July 7, 1999

PROGRESS REPORT FOR JUNE 1999

Mr. Steve Faryan, On Site Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Conservation Chemical Company of Illinois (Site), Gary Indiana
Site Remediation, Monthly Progress Report
Progress Report No. 1

Dear Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the progress report for the month ending June of 1999. Krikau, Pyles, Rysiewicz and Associates, Inc. (KPR), the 6500 Industrial Highway Groups contractor, was granted access across the Western Scrap property that was needed to access the site on June 3, 1999. At this time, KPR was able to begin the process of soliciting final bids from its subcontractors. Prior to this time, KPR could not have its subcontractors visit the site in order for them to prepare their final bids. On July 1, 1999, the United States Environmental Protection Agency relinquished control of the site to KPR.

During the month of June 1999, KPR completed the following tasks.

1.) Contracts were issued by KPR to the following subcontractors:

A.) Test America, the laboratory that will do all of the required analysis work on samples taken at the site with the exception of those for asbestos.

B.) QST, Inc., this firm will perform all of the required QA/QC work.

C.) Clean Harbors, the firm that will be doing the required HAZCATTING.

D.) Allied Waste Landfill in Newton County Indiana, the disposal site for all construction and demolition debris that will be removed from the site.

E.) Cole Engineers was awarded the contract to survey the site to locate the property lines.

F.) A&R Security was awarded the contract to provide site security for the duration of the cleanup.

2.) Mobilization Work:

The office and guard trailers the US EPA had rented to use during the removal of the PCB Pile were contracted in KPR's name and moved to a new location on site. Utilities, such as electrical power, sanitation facility, drinking water and etc. were completed. The existing decon pad was upgraded and repaired. Temporary fencing was installed along the north edge of the site to limit temporary access to the site.

3.) Work completed in accordance with approved work plan:

A.) A site security firm was retained and was on site on July 1, 1999.

B.) All three (3) acid lagoons were sampled and samples analyzed. The analyses performed was TCLP Metals, Total Chrome, Hexavalent Chrome and PCB's. Attached are photographs showing the sampling being done.

C.) Tanks and Pits were sampled and inspected. Forty eight (48) of the fifty eight tanks were sampled along with all pits.

D.) The asbestos survey was completed.

E.) The site was video taped to provide a visual image of its condition before the cleanup began.

F.) The survey of the site to determine its property lines was completed.

G.) Work began to remove and dispose of the construction debris that is on site.

4.) Requested proposals from subcontractors:

A.) Proposals were solicited from fencing contractors.

B.) Proposals were solicited from scrap steel cutters and hauling contractors.

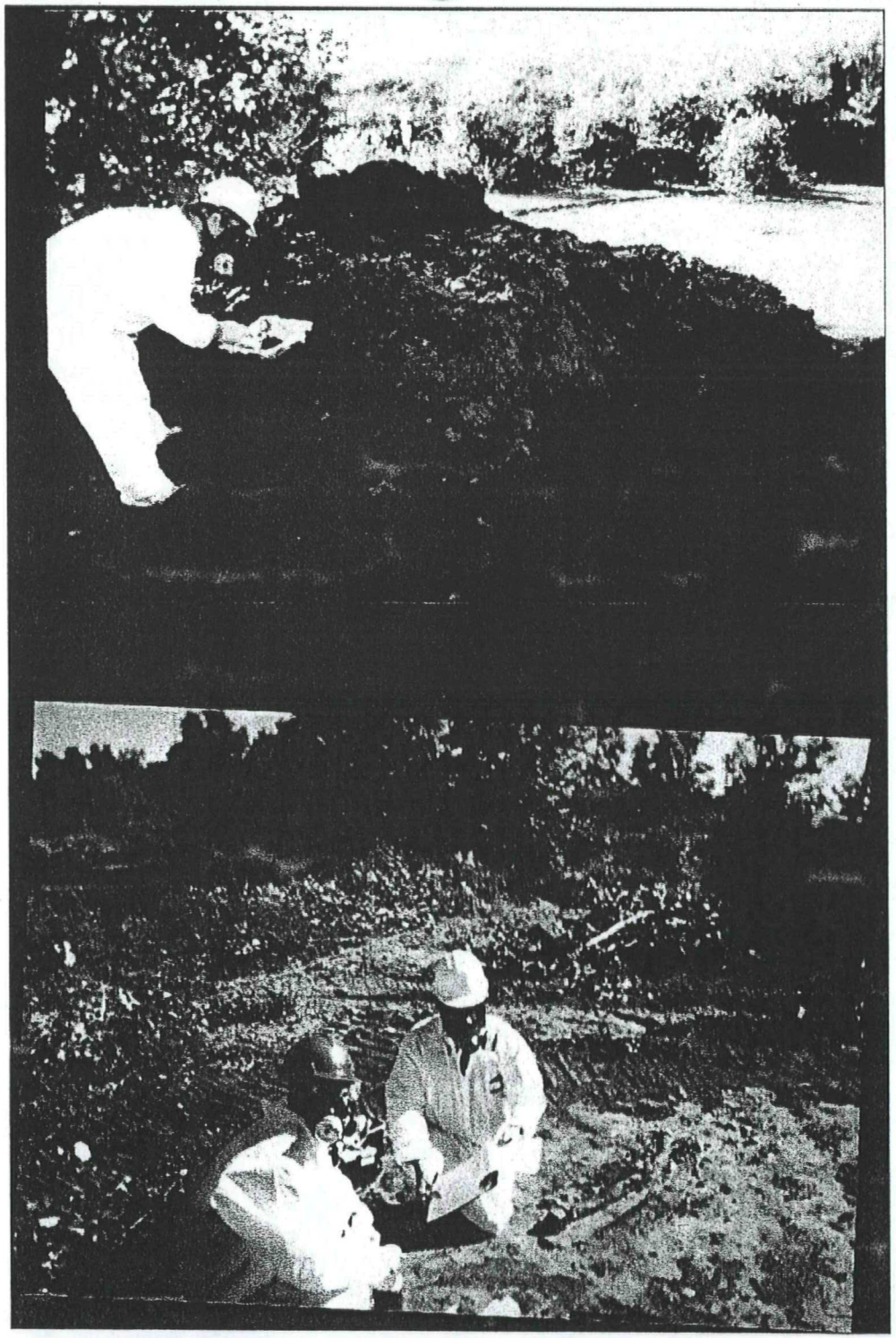
Should you have any questions, please do not hesitate calling

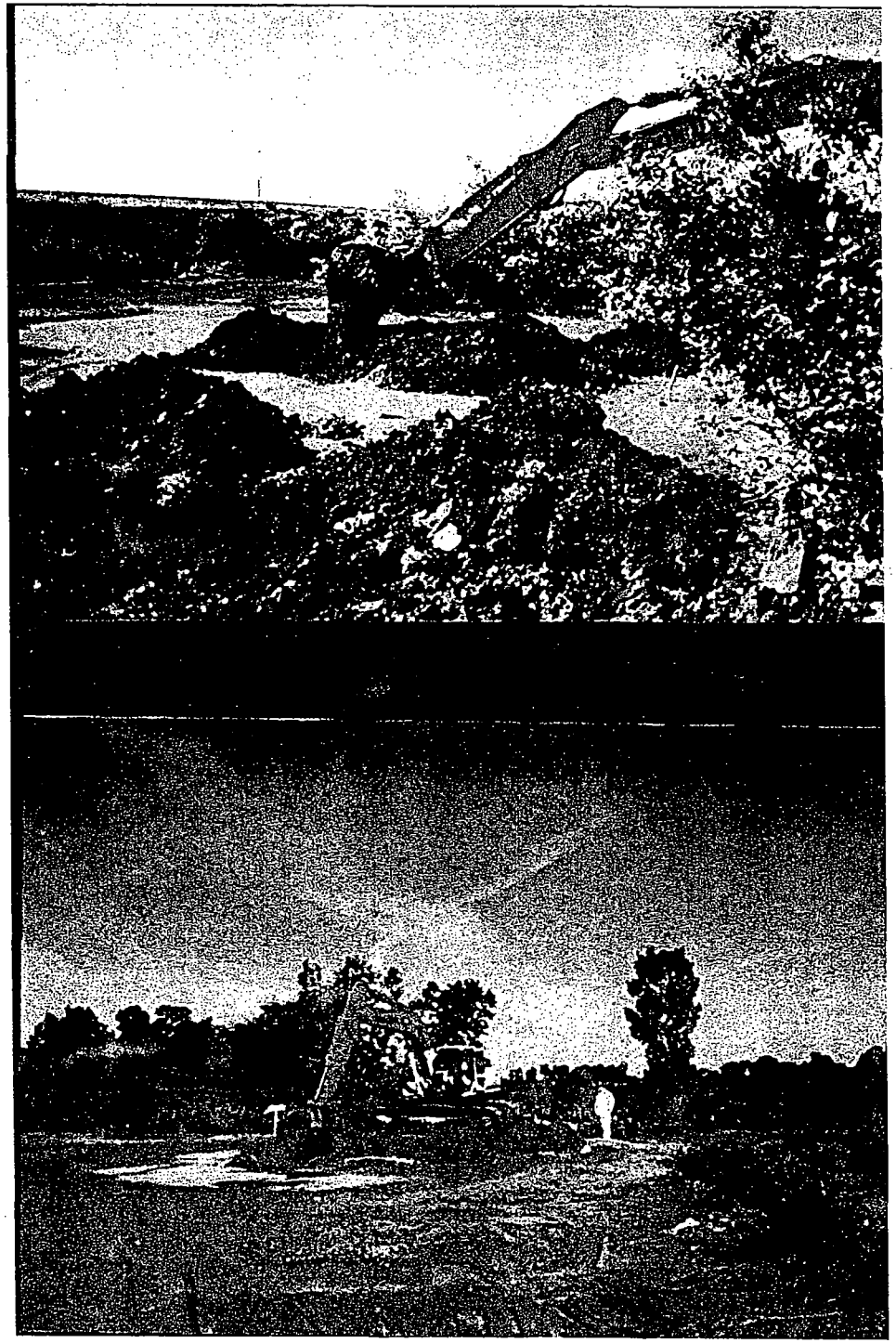
Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau P.E.

FGK/dr





KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

August 5, 1999

PROGRESS REPORT FOR JULY 1999

Mr. Steven Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc. (Site), Gary, Indiana
Site Remediation, Monthly Progress Report
Progress Report No.2

Dear Mr. Faryan:

In accordance with the above referenced Administrative Consent Order (ACO) for the above referenced site, the following is the progress report for the month of July 1999.

During the month of July 1999, the following was accomplished.

1.) TANKS AND PITS:

All previously emptied tanks, existing tanks with liquids and sludges in them and pits were sampled except for tank #11. The results of the analyses of the samples taken are pending.

2.) LIQUIDS, SLUDGES AND SOLIDS IN TANKS:

There are a number of tanks and pits that were not emptied and cleaned by International Technology approximately eight years ago. In 1993, US EPA's TAT group, Ecology and Environment Inc., sampled these tanks and pits. In planning this project, Krikau, Pyles, Rysiewicz and Associates, Inc. (KPR), relied on this sampling. Based on the sampling done to date, the liquids, sludges and solids in some of tanks are different then they were in 1993. This indicates that a great deal of "midnight dumping" has occurred on the site in the last few years.

3.) ASBESTOS SAMPLING RESULTS:

Materials found on tanks, structures, cooling towers, and oil cracking tower that contained suspected asbestos containing materials (ACM's) were sampled. Twelve tanks and the oil cracking tower contained ACM along with a small cooling tower and a wall in the building that is made of transite. Analyses of the samples taken show that a greater amount of asbestos is on site than anticipated. A minor amount of asbestos was found in the dome of the oil cracking tower. Since the oil cracking tower is the first scrap to be taken to Bethlehem Steel, this asbestos was removed and stored in an enclosed lock trailer on site until full scale asbestos removal takes place.

4.) COOLING TOWER SUMP:

The large water cooling tower on site was demolished. Beneath this cooling tower is a concrete sump that collected the cooled water. This sump is now filled with sludge. Chromates were found in the sludge in this sump. Samples were taken of this sludge for laboratory analyses to determine if hexavalent chrome, in regulated concentration is present or hazardous levels of chrome above TCLP levels exist in the sump sludge.

5.) INTERNAL LINED TANKS:

Twenty-nine (29) tanks are lined with some form of rubber lining. This was determined during the sampling of the contents of these tanks. Lined tanks cannot be sold as scrap steel. No scrap dealer will take them. Also, the majority of these lined tanks have asbestos mastic on their outside surface. This item was discussed with the 6500 Industrial Highway Technical Meeting held on July 20, 1999. The decision was made by the technical committee to dispose of these tanks at an acceptable landfill.

6.) BURIED DRUMS:

After the cooling tower was demolished, a buried drum grave yard was found. The drums are packed up against the cooling tower sump. The disposition of these drums needs to be determined.

7.) TRASH REMOVAL:

To date, a total of 140 tons of construction/demolition debris has been removed from the site and disposed.

8.) SCRAP STEEL:

Brandenberg mobilized on site and began cutting clean tanks. As of July 30, 1999, only seven tons of scrap were disposed of at Bethlehem Steel.

9.) HOT ZONE FENCING:

Area's of the site was divided into cold and hot zones. The degree of hazard was used to determine if a particular area is a hot zone. All hot zones were fenced to prevent

unauthorized entry.

10.) SITE EMERGENCY EXIT:

Permission was received from SES to use the old site access road across their property as a site emergency exit. This road was grubbed to provide use.

11.) DRUM SAMPLING:

Drum sampling began during the latter part of July. 64 drums were sampled in July.

12.) HEALTH AND SAFETY:

A health and safety audit was performed by Network Safety, Inc. on July 12, 1999. A copy of this audit is available in the site office trailer.

13.) FIRE AND RESCUE REVIEW:

On July 15, 1999, Chief Hines of the Gary Fire Department was on site to become familiar with the condition of the site in case of an emergency. A site map and tank inventory sheet was provided to Chief Hines.

14.) SITE GRUBBING:

During July 1999, site grubbing was accomplished. Trees, bushes and weeds were removed so that access and visual viewing of the site surface could be done. During this grubbing, additional drums were found.

14.) RESULTS OF SAMPLING ANALYSES:

A complete list of the analyses of materials sampled at the site is available for your review in the construction trailer on site.

Should you have any questions, please do not hesitate to ask them at our Monday morning meetings.

Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau P.E.

cc: 6500 Industrial Highway Group
FGK/dr

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

August 31, 1999

PROGRESS REPORT FOR AUGUST 1999

Mr. Steven Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc. (Site), Gary, Indiana
Site Remediation, Monthly Progress Report
Progress Report No.3

Dear Mr. Faryan:

In accordance with the above referenced Administrative Consent Order (ACO) for the above referenced site, the following is the Progress Report for the month of August 1999.

During the month of August 1999, the following was accomplished.

1.) ASBESTOS:

All asbestos, except for the asbestos on tanks T-26, T-27, T-28 and T-33 has been removed, collected, bagged and stored in the locked trailer that is on site. As soon as these vertical tanks T-26, T-27 and T-28 are laid on their sides, which is scheduled for September 2 and 3, 1999, the asbestos coatings on these tanks will be removed. It is anticipated that this work will be completed the week of September 6, 1999. This will complete all asbestos work on the site.

2.) ABOVE GROUND DRUMS:

All above ground 55 gallon drums have been sampled. The results of this sampling has been received by KPR and is presently being evaluated so that disposal of these drums can be accomplished. A total of 165 drums were sampled.

3.) TANKS AND BASINS:

All tanks, with the exception of T-51, T-52 and T-55, have been accessed and cleaned (The residual left in the uncleaned tanks are awaiting disposal approval). The residuals from the cleaned tanks have been removed off-site by Clean Harbors via bulk loading (90,143 gallons) and, where necessary, using drums (30 drums). A total of 76 additional drums and three (3) cubic yard boxes are waiting removal by Clean Harbors on September 1, 1999.

A new basin (B-3) was discovered on site. Samples of the liquid and sludge found in B-3 have been sent to Test America Laboratory for analysis.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

1056 Killarney Drive Dyer, Indiana 46311 Telephone 219-865-6848 Facsimile 219-865-6587

The contents in B-2 were determined to be uncontaminated, so authorization was received from US EPA to fill with broken/crushed brick and concrete from the on-site demolition work.

A total of 29 cleaned steel tanks, 15 of which are rubber lined, need to be cut and sent to Bethlehem Steel or, if lined, to Newton County landfill. This work is tentatively scheduled for the week of September 20, 1999.

4.) TRASH AND CONSTRUCTION DEBRIS:

During the month of August, over 25 tons of trash and debris was removed from the site. This brings the total of trash and construction debris removed from the site to over 165 tons.

5.) INTERNAL LINED TANKS:

Over 80 tons of lined tanks have been cleaned, cut and disposed of at Allied Waste during the month of August 1999.

6.) UNLINED TANKS:

Over 290 tons of unlined tanks and steel tower debris has been cleaned, cut and disposed of as scrap steel at the Bethlehem Steel Plant during the month of August 1999.

7.) LAB PACKS:

All obsolete laboratory chemicals, reagents and samples were collected in the field and placed in lab pack containers. A total of 22 lab packs were disposed of during the month of August 1999.

8.) COOLING TOWER SUMP:

Sampling and analyses of the material found in the cooling tower sump shows that this material does not contain unacceptable levels of chrome and will be left on site.

9.) HEALTH AND SAFETY:

No health and safety issues occurred during the month of August 1999.

Should you have any questions, please do not hesitate to ask them at our Monday morning progress meetings.

Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau P.E.

cc: 6500 Industrial Highway Group
FGK/dr

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

October 4, 1999

PROGRESS REPORT FOR SEPTEMBER 1999

Mr. Steve Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc.(site) , Gary Indiana
Site Remediation, Monthly Progress Report,
Progress Report 4.

Dear Mr. Faryan:

During the month of September 1999, the following was accomplished:

1.) TANKS AND PITS:

With the exception of Tank 51, all tanks that had liquids and sludges in them at the start of this remediation have been emptied, the liquids and sludges disposed of and tanks T-26, T27 and T28 laid down on the site ready for final cleaning. Basin 2 was backfilled with crushed stone

2.) LIQUIDS, SLUDGES AND SOLIDS FROM TANKS:

During the month of September 1999, the following liquids, sludges and solid waste was removed from the site and disposed.

A.) Approximately 385 cubic yards of non-hazardous waste from T-55.

B.) 100 cubic yards of concrete debris.

C.) 165 cubic yards of construction debris.

414 Plaza Drive, Suite 106 Westmont, Illinois 60559 Telephone 630-325-1300 Facsimile 630-325-1593

1056 Killarney Drive Dyer, Indiana 46311 Telephone 219-865-6848 Facsimile 219-865-8587

D.) 76 drums, three cubic yard boxes and 25 tons of Hazardous Waste.

E.) 14 tons of railroad ties.

F.) 22 tons of rubber lined steel from tanks.

G.) 125 tons of demolition debris.

3.) ASBESTOS:

During September 1999, the asbestos removal was completed at the site. A total of 275 bags of asbestos containing material was disposed of off-site

4.) BUILDING DEMOLITION:

During September 1999, the large building that was on site was demolished and disposed.

5.) HEALTH & SAFETY:

No health and safety issues occurred during September 1999.

If you have any questions, please do no hesitate to raise them at our Monday morning project meetings.

Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau P.E.

FGK/dr

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

November 5, 1999

PROGRESS REPORT FOR OCTOBER 1999

Mr. Steve Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc.(site) , Gary Indiana
Site Remediation, Monthly Progress Report,
Progress Report 5.

Dear Mr. Faryan:

During the month of October 1999, the following was accomplished:

1.) TANKS AND PITS:

Not counting Tank 51 that will be addressed later in this report, all other tanks were cleaned, cut up and either sold as scrap steel or, in the case of rubber lined tanks, disposed of at Allied Waste. A total of approximately 170 tons of rubber lined scrap steel was sent to Allied Waste. In addition, approximately 15 tons of brick lining material was also disposed of as a non-hazardous special waste at Allied Waste.

2.) TANK 51:

Tank 51 contained both liquid and solid hazardous waste. This tank was emptied of both the liquids and solids. These liquid and solid hazardous wastes were disposed of as a hazardous waste. Tank 51 was then cleaned, cut and disposed.

3.) SURFACE DRUMS:

A total of 165 surface drums were emptied, the contents re packed in roll off boxes ready for disposal. The drum carcases were cleaned and disposed of as scrap steel.

4.) LAGOON TREATABILITY STUDY:

Hexavalent chrome was found in the pie shaped lagoon. A treatability study was performed using different types of alkaline materials attempting to convert the hexavalent chrome into its trivalent form. This treatability study confirmed that this conversion would take place. Attached to this report are the supporting laboratory results.

5.) HEALTH & SAFETY:

No health and safety issues occurred during October 1999.

6.) WOOD CHIPPING:

A lot of trees, bushes and etc. were knocked down during the tank and drum removal. They were scattered throughout the site. A wood chipper was brought on site and the trees and bushes were chipped.

7.) US EPA WORK ON THE BOTTOMS OF TANKS 54 & 56:

Oil was found in the soils under tanks 54 and 56. During the month of October, a US EPA contractor removed and/or stabilized these oil contaminated soils.

8.) GROUNDWATER WELLS:

The groundwater wells found on site were sampled by US EPA during the month of October 1999. These groundwater wells will now be removed in accordance with IDEM requirements.

9.) RAILROAD TRACKS:

The railroad track that ran through the middle of the CCCI property was partially removed during the month of October. The steel track was recycled and the railroad ties removed and are ready for disposal.

10.) EXTENT OF CONTAMINATION STUDY:

During the month of October 1999, the extent of contamination study on the eastern one third of the site begun. Rather then using the soil boring technique in performing this study, test pits were dug. More than twenty-five attempts were made to dig test pits in those areas of the eastern on third of the site to a depth of five to six feet in those areas that were not covered with concrete (ie: the building foundation). Only ten of the twenty-five test pits could be excavated to the required depth. The entire eastern one third of the CCCI site contains the remnants of Berry Oil Company. Numerous subsurface concrete and steel foundations were encountered including a subsurface maze of underground piping. Some of piping encountered were 12 inches to 18 inches in diameter. It was apparent that the majority of this underground piping had not been emptied of oil when

Berry Oil ceased operation. This piping has now deteriorated and is leaking oil. Also, a great number of pipes exit the site going onto the EJ&E Railroad property. Where these pipes end up is unknown. However, what is known is that these pipes contain a lot of oil. They are leaking and the subsurface soils are saturated with the leaking oil. Based on this finding, US EPA agreed that additional test pitting would not be required and there would be no need to perform the geo-physical study.

11.) AIRPORT ENVIRONMENTAL COMMITTEE TOUR OF CCCI SITE:

On October 27, 1999, the environmental committee of the Gary Airport toured the CCCI site. This same committee toured the site in June of this year. The committee was "shocked" to see how much work has been completed in just four months. They could not believe that the site is now a flat, vacant parcel of land.

12.) OCTOBER 29, 1999 FIRE OF SURROUNDING PROPERTIES:

On October 29, 1999, the vacant properties to the west and north of the site caught on fire. Flames from this fire were estimated to reach heights of 25 to 30 feet. Dense black smoke was generated by this fire. The smoke indicated that some of the oil soaked property north and west of the CCCI site also burned. The Gary Fire Department was granted access to the CCCI site to fight this fire. No damage was done to the CCCI site or the equipment located on the site.

If you have any questions, please do no hesitate to raise them at our Monday morning project meetings.

Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau P.E.

FGK/dr

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

December 13, 1999

PROGRESS REPORT FOR NOVEMBER 1999

Mr. Steve Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc.(site) , Gary Indiana
Site Remediation, Monthly Progress Report,
Progress Report 6.

Dear Mr. Faryan:

In accordance with the above referenced Administrative Consent Order (ACO) for the above referenced site, the following is the Progress Report for the month of November 1999.

During the month of November 1999, the following was accomplished.

1.) TEST PITS:

Test pits were dug along the common property line of the site and the EJ&E Railroad. Numerous underground pipes were encountered. These pipes, full of oil, and foundations were left over from the time that Berry Oil Company occupied the site. Because of the underground pipes and foundations, only nine (9) test pits could be dug. A soil sample was taken from each test pit and submitted for laboratory analyses.

2.) RAILROAD TRACK REMOVAL:

The railroad track that ran through the middle of the site was removed. The steel railroad tracks will be sold as scrap. The railroad ties were removed and stock piled. Some, but

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not all, of these railroad ties were disposed of at the Allied Waste landfill. The remainder will be sent to Allied in early December.

3.) WOOD CHIPPING:

During the remediation done on site to-date, a substantial quantity of up-routed trees and bushes were accumulated. All of these trees and bushes were chipped.

4.) BASIN ONE LIQUIDS:

The liquids found in Basin 1 were removed and disposed of at the CID disposal site.

5.) BASIN ONE SLUDGES

The sludge material found in Basin 1 was stabilized using Omni Materials "Buffington" kiln dust. Samples of the stabilized material were taken and submitted to a laboratory for the analyses needed for disposal. Based on the analyses, the search for an appropriate disposal site is being undertaken.

6.) DRUM CONTENTS DISPOSAL:

The two (2) roll-off boxes that contained hazcatted drums contents were removed from the site and disposed of at the Clean Harbors incinerator in Kimball, Nebraska.

7.) RINSEATE DISPOSAL:

Rinseate liquids from Tanks 26, 27 and 28 that were contained in 55 gallons drums were disposed of at Clean Harbors in Chicago Illinois.

8.) TEST TRENCHING, TANK 55 AND COOLING TOWER:

Test trenching was done alongside Tank 55 and in the area adjacent to the old cooling tower sump to determine the extent of the buried drums encountered.

9.) ADJACENT SITE FIRE:

A major fire occurred on the properties adjacent to the CCCI site due to the dry weather conditions. It was necessary to grant the Gary Fire Department access to the CCCI site to reach part of the fire. After the initial fire was extinguished and since the area west of the CCCI site is a "bog", a continual bog fire flared up almost every day for the next week.

10.) MONITORING WELL CLOSURES:

A contractor has been retained to close the tem (10) monitoring wells identified on-site. This work has been scheduled for the week of December 13, 1999.

11.) SITE SURVEY:

A property line survey along the lagoons is scheduled to be performed the week of December 6, 1999. This survey is necessary in order to relocate off-site lagoon material, after stabilization, on-site.

Should you have any questions, please do not hesitate to ask them at our progress meeting.

Very Truly Yours
Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau, P.E.

cc: 6500 Industrial Highway Group
FGK/dr

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

PROGRESS REPORT FOR DECEMBER 1999

Mr. Steve Faryan, OSC
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois, Inc.(site), Gary Indiana
Site Remediation, Monthly Progress Report, Progress Report Number 7.

Dear Mr. Faryan:

In accordance with the above referenced Administrative Consent Order (ACO) for the above referenced site, the following is the Progress Report for the month of December 1999.

1.) RAILROAD TRACK REMOVAL:

The railroad ties remaining after the steel tracks were removed from the onsite railroad spur were disposed of at the Allied Waste landfill in Newton County, Indiana.

2.) SITE GRADING:

The site has been cleared of all surficial tanks, railroad tracks and building structures except for basin No. 1 and the lagoons. Other than the work associated with these two areas, the site grading activities have been completed.

3.) BURIED DRUMS NEXT TO TANK 55 AND FORMER COOLING TOWER:

The crushed buried drums found next to Tank 55 were excavated and stockpiled. Samples

of the contents from these drums and drums located near the former cooling tower were taken and submitted for laboratory analysis for disposal parameters. Based on the confirmatory analytical results, these drums were determined to be acceptable for disposal as a nonhazardous waste at CID. This removal activity is scheduled for the week of January 10,2000.

4.) SITE SURVEY:

A survey was performed to establish and demarcate the exact property lines near the lagoons. The property line location was required to delineate off site lagoon materials and to facilitate their relocation to the CCCI property.

5.) MONITORING WELL CLOSURES:

The Ten (10) monitoring wells which were identified on site were removed in accordance with Indiana regulations. Monitoring well closure records were prepared and filed with the State of Indiana.

6.) CONTAINMENT BARRIER:

As you know, test pit excavations were performed along the east property line (adjacent to the EJ&E property) and numerous underground pipes and subsurface foundations were encountered. These pipes and subsurface foundations are remnants from the previous occupant, Berry Oil. Due to the presence of these subsurface structures, the installation of a containment barrier along the property line is not feasible. Moreover, as previously presented, the spacial environmental impact of the petroleum problem extends well beyond the footprint of the containment barrier and, therefore its installation would do little to address and control the petroleum migration to the airport property. As a result, the US EPA has developed a different strategy to control the oil discharge. This new method negates the need for the containment barrier and provides for interception of the petroleum before it reaches the ditch. To help pay for this new method, the 6500 Industrial Highway Group has agreed to donate funds to this project. Mr. Jim Harrington, Chairman of the 6500 Industrial Highway Group PRP committee has been in contact with US EPA's attorney to finalize the donation and its effect upon the ACO.

7.) BASIN 1 SLUDGES:

The waste materials contained within basin 1 were determined, during the assessment phase of the project, to contain high levels of volatile organic compounds. The physical characteristics required the removal and disposal of the water phase and the stabilization of the underlying sludges. The stabilization activities entailed the addition and periodic mixing of lime kiln dust. The material required an additive mixture of ten percent.

During the stabilization activities, the structural configuration of basin 1 was also determined. KPR learned that the basin contained a variety of subsurface baffles to create a weir - type structure measuring approximately twelve feet in total depth, four feet greater than what was previously measured. In addition, two smaller basins which were connected in series, were also encountered at the inlet end of the basin.

As a result, a greater volume of sludge required stabilization. The stabilized materials were allowed to cure and were subsequently sampled and tested for disposal parameters. KPR has submitted these results to The Environmental Quality Company for disposal acceptance. KPR anticipates the disposal of sludge materials will commence in January, 2000. The remaining task for the completion of the remediation of basin 1 will be to decontaminate the structure.

Should you have any questions, please do not hesitate to ask them at our progress meeting scheduled for January 11, 1999.

Very Truly Yours

Fred G. Krikau P.E.

FGK/ks

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

February 1, 2000
PROGRESS REPORT FOR JANUARY 2000

Mr. Steven Faryan, OSC
United States Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Administrative Consent Order (ACO) in the matter of:
Conservation Chemical Company of Illinois (Site), Gary Indiana
Site Remediation, Monthly Progress Report, Progress Report number 8.

Dear Mr. Faryan:

In accordance with the above referenced ACO for the above referenced site, the following is the Progress Report for the month of January 2000.

1.) BURIED DRUMS NEXT TO COOLING TOWER AND TANK 55.

The buried drums found next to the cooling tower and Tank 55 were loaded and disposed of as a non-hazardous waster at the CID Landfill in Chicago Illinois. The weight disposed of totaled 67.7 tons.

2.) STABILIZATION OF BASIN ONE SLUDGES:

The sludges found in Basin One were stabilized with kiln dust. Even after stabilization, the sludges were found to be a hazardous waste. Arrangements were made to dispose of the stabilized sludges at the EQ facility located in Bellville Michigan. EQ has the ability to treat the stabilized material prior to land disposal. Initially 230 tons of stabilized

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material was treated but was found to be very difficult for EQ to treat because of high concentrations of chloro-benzene. The next four loads of the stabilized sludges sent to EQ, which was in transit when EQ determined that their treatment process would not work, were rejected and returned to the CCCI site. This material was returned to Basin 1 for additional treatment with kiln dust. If further addition of kiln dust does not allow EQ's treatment process to work, the sludges will need to be incinerated at a much high cost. EQ will resample the additionaly treated material at the site on February 3, 2000.

3.) TEST PITS, EASTERN AND THIRD OF SITE:

In lieu of soil borings and a ground penetration study, fourteen test pits were dug. Thirteen of these test pits were dug in the eastern third of the site and one test pit was dug under tank 51 because the contents of this tank had leaked through the bottom of the tank. Attached is a map of the site showing the locations of the test pits dug. Soil samples were taken from each test pit and analyzed. The results of the soil analyses showed that at Test Pit 5, lead exceeded TCLP limits and Test Pits 12 and 14 exceeded TCLP limits for chlorinated solvents. Based on the analytical results, an additional soil sample was taken at Test Pit 5 to verify the level of lead at that location . Additionally, soil from Test Pit 12 and from under tank T-51 (Test Pit 14) was excavated, staged on plastic and sampled for disposal parameters.

4.) OLD TRUCK AND CAR TIRES:

Some additional old tires found on site were cut and disposed of along with the initial Basin 1 solids sent to EQ.

5.) UNDERGROUND PIPING LEAVING SITE ONTO EJ&E RAILROAD PROPERTY:

In preparation for designing the Containment Barrier (barrier) along the common property line with the EJ&E Railroad, test excavations were made to determine where the pipes go and how far. Most of the pipes are cut off right at the property line and are leaking oil. The others are connected to what appears to be a "header" pipe that runs parallel to the property about one foot onto the railroad property. Where this header pipe goes is unknown because it crosses onto Western Scrap property. The design of the Containment Barrier will now proceed.

6.) BURIED DRUMS NORTH EAST OF COOLING TOWER:

A large quantity of buried drums were found in the area north east of the old cooling tower. These drums were excavated and and staged on site. Their disposition is pending.

7.) SLUDGE LAGOONS:

Work will begin to stabilize and move off-site lagoon material on-site the first week in February. Work will begin on the off-site lagoon, followed by the Acid Lagoon and the Pie Shaped Lagoon.

Should you have any questions concerning this report or the activities on site, please do not hesitate to ask them at our progress meetings.

Very Truly Yours

Fred G. Krikau P.E.

FGK/mk

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

March 24, 2000

PROGRESS REPORT FOR FEBRUARY, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.:17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - February 2000
Progress Report No. 9

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending February, 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of February, 2000, KPR completed the following activities:

Off-Site Lagoon Stabilization

During the month of February, KPR conducted stabilization activities on the materials within the off-site lagoon. The scope of these activities was performed as per the approved work plan. However, the volume of material encountered was substantially greater than earlier studies described. KPR encountered no noteworthy difficulties with the management of the additional volume of material. As determined by the treatability study, these materials were stabilized with the addition of lime kiln dust at an add ratio of 10%. These materials were stabilized in-place using hydraulic backhoes. As of the end of the month of February, over one-half of the off-site lagoon materials were stabilized and sampled for closure validation analysis. These materials will be considered acceptable if their hexavalent chrome content is less than 200 mg/kg and the T.C.L.P. chrome content is less than 5.0 mg/L. KPR anticipates the completion the off-site lagoon stabilization activities to be completed by mid-March. Upon its completion, KPR will initiate stabilization activities on the acid lagoon. Upon receipt of acceptable analysis of the closure validation samples, KPR will relocate these stabilized materials to an on-site area.

Basin 1 Stabilization & Disposal Activities

As described in KPR's January, 2000 Progress Report, the materials from within Basin 1 were rejected by the disposal facility and required additional on-site treatment. KPR continued its effort to stabilize the material with the addition of more lime kiln dust and additional mixing. Subsequently, KPR requested EQ, the disposal facility, to re-sample and analyze the materials to determine if they were acceptable for disposal. The results of the re-sampling indicated that the materials would be acceptable and the shipments of these wastes were again initiated on February 24, 2000. During the month of February, 2000 approximately 120 tons of Basin 1 waste were sent for disposal at EQ. KPR anticipates that the complete removal of this waste will be completed before March 20, 2000. KPR will then clean the basin structure and, as directed, backfill the basin with clean granular materials.

T-51 Contaminated Soils

Tank No. 51 (T-51) contained a variety of liquid and sludge wastes which were properly managed and disposed of by KPR. The tank structure was decontaminated, sheared and disposed as a recycled metal. Upon the dismantlement of this structure, stained soils were observed beneath a portion of the tank. KPR was directed to excavate this stained area. The contaminated soils generated by this corrective action activity were determined to be hazardous. KPR prepared the requisite profiles, loaded, transported, and disposed of these materials at EQ. The resulting excavation was approved for backfilling and was filled with clean imported granular materials. The volume of contaminated soil removed and disposed from this area totaled more than 151 tons. This task is now complete.

Laboratory Chemicals

During the requested test pit excavation activities, KPR unearthed 11 laboratory reagent containers. These reagents were intact and some of their labels were legible. These reagents were secured, hazcatted, properly containerized for shipment and disposed of at Clean Harbors, Inc. This task was completed on February 22, 2000 by Clean Harbors Lab Pack Services Group.

Safety Audit Results

On February 14, 2000, an independent health and safety audit was conducted by Network Safety Consultants, Inc. The scope of the audit was to check KPR's work activities with respect to the site health and safety plan. This audit was performed by Mr. Louis Paz, who found no significant non-compliance issues. As a result of the audit, Network Safety offered three (3) suggestions; including improvement of the existing demarcation of the exclusion zone, update the exclusion zone map that is posted in the trailer, and remove a one gallon fuel can that did not have a spark arresting vent. These suggestions were addressed and implemented immediately after the audit. No outstanding issues remain.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
President

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

April 4, 2000

PROGRESS REPORT FOR MARCH, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.:17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - March 2000
Progress Report No.10

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending March 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of March 2000, KPR completed the following activities:

Lagoon Stabilization Activities

During the month of March, KPR continued to conduct stabilization activities on the materials within the lagoons. The scope of these activities was performed as per the approved work plan. As determined by the treatability study, these materials were stabilized with the addition of lime kiln dust at a ratio of 10%. These materials were stabilized in-place using hydraulic backhoes. The stabilization of the off-site lagoon materials was completed on March 13, 2000. The closure verification analysis of the off-site lagoon materials demonstrated that the acceptance criteria was successfully obtained. Upon the completion of the stabilization effort within the off-site lagoon, KPR's stabilization activities focused upon the stabilization of the acid lagoon materials. KPR initiated stabilization activities on the acid lagoon on March 13, 2000. KPR found the volume and moisture consistence to be less than the characteristics in the off-site lagoon. This enabled KPR to complete the stabilization of this material by March 20, 2000. KPR collected closure validation samples and as of the preparation of this progress report has received a verbal report from the laboratory that the closure samples were compliant with the acceptance criteria.

On March 20, 2000, KPR initiated the site grading work to provide for the relocation of off-site stabilized soils to an on-site area. The placement area, herein to be referred to as the T-56 area, was graded level after all residual debris was removed. Clean imported clay fill was then placed to construct a earthen berm around its perimeter. As of March 31, 2000, KPR had placed approximately 6,600 cubic yards of material from the off-site lagoon into the T-56 placement area. KPR estimates that approximately 650 cubic yards remain to be relocated from the off-site lagoon and approximately 2,500 cubic yards from the acid lagoon. The completion of the placement of these materials should be completed by late April 2000.

Stabilization of the materials in the pie-shaped lagoon materials was initiated on March 20, 2000 and has progressed well. As of March 31, 2000, approximately 65% of the lagoon materials had been stabilized. KPR anticipates completing the stabilization activities around the end of April.

Basin 1 Stabilization & Disposal Activities

During the month of March 2000 approximately 250 tons of remaining Basin 1 waste were sent for disposal at EQ in Belleville, Michigan. Upon completing the removal of the Basin 1 waste, KPR cleaned the basin structure and, as directed, backfill the basin with clean granular materials. The cleaning residuals were sent out with the last load of material to EQ for disposal. During the removal of the residual materials and the cleaning process, 680 gallons of water was pumped and sent to Clean Harbors, Inc. in Chicago, Illinois for treatment and disposal. This task is complete and no further actions are required in the basin area.

U.S. EPA's Geophysical Survey

On March 13, 2000, U.S. EPA performed a geophysical survey of the T-56 placement area, the former T-51 tank area, and within an area near Basin 1. The results of the survey identified several anomalies in these three (3) areas. KPR excavated the T-56 area to assess the anomalies and found several sections of buried pipe and several scrap drums. The scrap drums were removed and the area was cleared for the placement of soil materials. At EPA's request, KPR preformed an exploratory test excavation at the anomaly identified near the former T-51 tank. This anomaly was marked and determined to extend beneath the service road that is located north of the decontamination pad. The excavation encountered numerous drums in the marked area and found the marking to be accurate. Although some drums were removed, the majority of the drums including those under the road were not excavated since damage to the service road would compromise on-going site activities. The area was backfilled and marked for subsequent drum removal. The area near Basin 1 was not disturbed as it too was located in an area of active remediation. This area will be explored when site work will not be encumbered. No other anomalies were discovered.

Internal Safety Audit Results

KPR conducted an internal site health and safety audit. The scope of the audit was to assure that site work activities were consistent with the health and safety plan. This audit found no significant compliance issues. KPR conducted a brief safety meeting with site personnel to review specific components of the safety plan and to keep personnel attuned with protocols. No outstanding issues or concerns were identified.

Other Miscellaneous Activities

Other non-task specific site activities included the removal of accumulated scrap steel materials. KPR loaded, transported and recycled approximately 23 tons of metal at Bethlehem Steel Corporation's Gary Plant. (Note that the reconciliation of the actual weight tickets are pending.) In addition, KPR had accumulated approximately 45 discarded tires through general site excavation activities. These tires were sheared and disposed of with the Basin 1 material at EQ's, Michigan Facility. During the month of March, KPR performed minor grading repairs to the service road leading into the site. These repairs entailed the placement of imported limestone to level-off the potholes. KPR also secured the cinder block building next to the entry gate. This building had several large holes which could be used for unauthorized access to the service road. These holes were secured using small sections of chain-link fence that were fastened to the exterior wall using self-tapping screws.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

May 2, 2000

PROGRESS REPORT FOR APRIL, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - April 2000
Progress Report No.11

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending April 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of April 2000, KPR completed the following activities:

Lagoon Stabilization Activities

During the month of April, KPR continued to conduct stabilization activities on the materials within the pie-shaped lagoon. The scope of these activities was performed as per the approved work plan. As determined by the treatability study, these materials were stabilized with the addition of lime kiln dust at a ratio of 10%. These materials were stabilized in-place using hydraulic backhoes. The stabilization of the pie-shaped lagoon materials was completed on April 5, 2000. The closure verification analysis of the pie-shaped lagoon materials demonstrated that the acceptance criteria was successfully obtained in the western half, however, samples from the eastern half (5 individual sample areas) exceeded the objective for TCLP chrome of 5 mg/L. Since the moisture content of this material appeared to be less than desirable, clean water was utilized to increase the moisture content and enhance the reagent's chemical reaction. The water additions were performed while remixing this area. The restabilization of

the eastern half of the pie-shaped lagoon was completed on April 26, 2000. KPR collected the requisite closure validation samples, submitted them for TCLP chrome analysis, and is awaiting the analytical results.

Removal of the off-site portion of the western half of the pie-shaped lagoon from along the E, J & E railroad bank was initiated. This material is being placed on the on-site portion of the acid lagoon. Once the grades of this area are acceptable, the area will also be capped with 2 feet of clay.

All material from the off-site lagoon was placed in the T-56 area. Clean imported clay was then placed to a depth of at least 2 feet over and around the staged material. This area was then graded and sloped to allow for drainage of runoff. Clean imported clay was packed on the north, east, and south banks of the former off-site lagoon. The west bank was sloped and graded utilizing existing native materials. Clean imported stone was placed on the bottom of the former off-site lagoon to a depth ranging from 2 - 4 feet to allow for natural drainage. Remediation of this area is now complete.

Removal of the off-site portion of the acid lagoon materials was completed during the month. This material was placed on the portion of the acid lagoon on the property. Placement and grading of clay along the banks of the off-site portion of the acid lagoon was initiated.

U.S. EPA's Geophysical Survey

The area near Basin 1 was explored for subsurface anomalies. Although a few partially disarticulated buried drum pieces were encountered and subsequently removed, the anomalies identified in this area typically were either buried pipes or scrap metal. All previously unexcavated drums in the former T-51 area were excavated and staged for removal. All excavated areas were backfilled and leveled to pre-existing conditions.

Containment Barrier

Discussions continue with the Gary Airport and U.S. EPA concerning the donation of $125,000.00 to the Gary Airport for the installation of a culvert pipe in their ditch to prevent oil from entering the ditch and then being discharged to the Grand Calumet River. This donation would be in lieu of the requirement to install the containment barrier required by the ACO entered into by the 6500 Industrial Highway Group. A meeting, including attorneys, will be held in the near future with the Gary Airport, U.S. EPA, and the 6500 Industrial Highway Group in an attempt to bring this issue to completion. U.S. EPA and the 6500 Industrial Highway Group have engaged in both technical and legal discussions and are in agreement that the installation of the culvert is appropriate.

Other Miscellaneous Activities

A laboratory bottle containing an unknown chemical and a drum of an unknown liquid which were encountered during the excavation of the off-site lagoon material were containerized and removed off-site for disposal by Clean Harbors, Inc. on April 24, 2000.

During the stabilization of the pie-shaped lagoon, approximately 20 - 30 railroad ties were encountered. These ties are being stockpiled for off-site disposal.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

June 1, 2000

PROGRESS REPORT FOR MAY, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - May 2000
Progress Report No.12

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending May 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of May 2000, KPR completed the following activities:

Lagoon Stabilization Activities

The initial stabilization of the pie-shaped lagoon materials was completed on April 5, 2000. The closure verification analysis of the pie-shaped lagoon materials demonstrated that the acceptance criteria was successfully obtained in the western half, however, samples from the eastern half (5 individual sample areas) exceeded the TCLP chrome objective of 5 mg/L. Since the moisture content of this material appeared to be less than desirable, clean water was utilized to increase the moisture content and enhance the reagent's chemical reaction. The water additions were performed while remixing this area. The restabilization of the eastern half of the pie-shaped lagoon was completed on April 26, 2000. KPR collected the requisite closure validation samples and submitted them for TCLP chrome analysis. Unfortunately, all samples, including the duplicate, exceeded the TCLP chrome level of 5 mg/L. Additional lime kiln dust was subsequently introduced into the eastern half and remixed. Upon completion of

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mixing in one-fifth of the eastern half (Cell 15), a closure verification sample along with a duplicate was obtained and submitted for TCLP chrome analysis. The results for both samples achieved the objective and, therefore, stabilization of the remaining areas was continued utilizing two excavator backhoes. This iteration of stabilization was completed on May 17, 2000 and closure verification samples were obtained from the remaining areas. However, the analytical results for all remaining areas again exceeded the TCLP chrome objective of 5 mg/L. KPR is investigating the potential for utilizing an alternate stabilizing agent to achieve the desired results.

Removal of the off-site portion of the western half of the pie-shaped lagoon from along the E, J & E railroad bank was completed. This material was placed on the on-site portion of the acid lagoon. This area, along with the T-56 area, were covered with at least 2 feet of clay and 3 inches of clean topsoil. Installation of erosion control on the slopes of each capped area and seeding of both areas was performed.

Buried Drums

The additional excavated buried drum debris which had previously been segregated into non-hazardous and hazardous waste streams and staged on-site were sampled and profiled for disposal. A total of 43.47 tons of non-hazardous debris was removed and disposed of at Waste Management's CID landfill on May 2nd. Three (3) truckloads of hazardous debris were removed from the site and transported for stabilization at Onyx Environmental's Controlled Waste facility in Menomonee Falls, Wisconsin on May 10th. All three (3) loads, however, were rejected at the site due to amendable cyanide concentrations which exceeded permit limits. The loads were returned to the CCCI site on May 11th and the waste stream was reprofiled for disposal at EQ in Bellville, Michigan. The three (3) loads were removed on May 23rd.

Containment Barrier

Discussions continue with the Gary Airport and U.S. EPA concerning the donation of $125,000.00 to the Gary Airport for the installation of a culvert pipe in their ditch to prevent oil from entering the ditch and then being discharged to the Grand Calumet River. This donation would be in lieu of the requirement to install the containment barrier required by the ACO entered into by the 6500 Industrial Highway Group. A meeting, including attorneys, was held on May 30, 2000 with the Gary Airport, U.S. EPA, and the 6500 Industrial Highway Group in an attempt to bring this issue to completion. As a result of this meeting, the airport tentatively agreed to initiate the engineering activities to design the culvert system.

Other Miscellaneous Activities

A load of scrap steel was removed from the site on May 9th and the appropriate payment amount credited to the PRP Group.

During the stabilization of the pie-shaped lagoon, approximately 20 - 30 railroad ties were encountered. These ties were removed off-site and disposed of at Allied Waste's Newton County Landfill on Thursday, May 18th.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

June 30, 2000

PROGRESS REPORT FOR JUNE, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - June 2000
Progress Report No.13

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending June 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of June 2000, KPR completed the following activities:

Lagoon Stabilization Activities

Bench scale tests utilizing fly ash and ferrous sulfate were both performed which indicated that the TCLP chrome objective of 5 mg/L could be achieved. Since the fly ash material is significantly cheaper in cost, it was utilized to mix the remaining non-compliant areas (Cells 13, 14, 16, and 17). Analytical samples from each area were subsequently obtained by both KPR and START which demonstrated compliance in Cells 14, 16, and 17. However, although KPR's sample result for Cell 13 was 4.32 mg/L, START's result for that area was 6.6 mg/L. It was agreed that since the analytical results were so close to each other and to the cleanup objective that the material in Cell 13 would be given additional time to cure and would then be resampled. Subsequent sampling of Cell 13 by KPR and START was performed on June 29, 2000.

Removal of the off-site portions of Cells 15 and 16 of the pie-shaped lagoon from along the E, J & E railroad bank was completed. This material was placed on-site near the former Basin 1 area. This area, along with the on-site portion of the pie-shaped lagoon, will be covered with at least 2 feet of clay and 3 inches of clean topsoil once all of the cells meet the cleanup objectives. Installation of erosion control on the slopes of the capped area and seeding of the areas will also be performed.

KPR has placed crushed limestone aggregate against the E, J & E railroad embankment to secure the site slope against slump and erosion. The material placement was reviewed with an E, J & E structural engineer. KPR has complied with their request to place backfill to previous elevations and provide a secure slope that would not easily erode. The use of the 3 inch stone will meet these objectives.

Containment Barrier

Discussions continue with the Gary Airport and U.S. EPA concerning the donation of $125,000.00 to the Gary Airport for the installation of a culvert pipe in their ditch to prevent oil from entering the ditch and then being discharged to the Grand Calumet River. This donation would be in lieu of the requirement to install the containment barrier required by the ACO entered into by the 6500 Industrial Highway Group. A meeting was held, including attorneys, on May 30, 2000 with the Gary Airport, U.S. EPA, and the 6500 Industrial Highway Group in an attempt to bring this issue to completion. As a result of this meeting, the airport tentatively agreed to initiate the engineering activities to design the culvert system.

Since then, authorization for the engineering of the culvert pipe by the airport has been initiated. When the engineering is completed, quotations will be obtained to install the culvert. If the price of the engineering and installation does not exceed $125,000.00, the culvert will be installed. If the cost is more than $125,000.00, additional discussions with the U.S. EPA and Gary Airport will be necessary.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

August 2, 2000

PROGRESS REPORT FOR JULY, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - July 2000
Progress Report No.14

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending July 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of July 2000, KPR completed the following activities:

Lagoon Stabilization Activities

Resampling of Cell 13 by both KPR and Start was performed on June 29, 2000. The analytical results for both samples, however, exceeded the objective for TCLP chrome. An addition of ferrous sulfate was made to Cell 13 and the area was resampled on July 12, 2000 by KPR and Start. The analytical results for this sampling episode demonstrated compliance with the requisite objectives for TCLP and hexavalent chrome.

Removal of the off-site portions of Cells 15 and 16 of the pie-shaped lagoon from along the E, J & E railroad embankment was completed. This material was placed on-site near the former Basin 1 area. This area, along with the on-site portion of the pie-shaped lagoon, was covered with a minimum of 2 feet of clay and 3 inches of clean topsoil. Erosion control fabric was placed on the exposed side slopes where

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drainage could potentially cause erosion. The entire capped area was seeded with a blend of grass seed. KPR has placed crushed limestone aggregate against the E, J & E railroad embankment to secure the site slope against slump and erosion. KPR has complied with their request to place backfill to previous elevations and to provide a secure slope that would not easily erode. The use of the 3 inch stone has met these objectives. The material placement was subsequently reviewed and approved by an E, J & E structural engineer.

Containment Barrier

Discussions continue with the Gary Airport and U.S. EPA concerning the donation of $125,000.00 to the Gary Airport for the installation of a culvert pipe in their ditch to prevent oil from entering the ditch and then being discharged to the Grand Calumet River. This donation would be in lieu of the requirement to install the containment barrier required by the ACO entered into by the 6500 Industrial Highway Group. A meeting was held, including attorneys, on May 30, 2000 with the Gary Airport, U.S. EPA, and the 6500 Industrial Highway Group in an attempt to bring this issue to completion. As a result of this meeting, the airport tentatively agreed to initiate the engineering activities to design the culvert system.

Since then, authorization for the engineering of the culvert pipe by the airport has been initiated. According to the airport's engineer, a draft design will be issued by mid-August. When the engineering phase is completed, quotations will be obtained to install the culvert. If the price of the engineering and installation does not exceed $125,000.00, the culvert will be installed. If the cost is more than $125,000.00, additional discussions with the U.S. EPA and Gary Airport will be necessary.

Demobilization Activities

A sample of the residuals from Tank T-24 (decon tank) was obtained on July 13, 2000 for disposal profiling. Once all equipment was cleaned, the residuals from T-24 and the decon pad sump were containerized in one (1) 55 gallon drum. After obtaining disposal authorization, the drum was removed from the site by Clean Harbors on July 31, 2000. Tank T-24 was subsequently cleaned, crushed, and removed off-site to a metal recycler. The decon pad was decommissioned.

Disconnection of site electrical and telephone utilities was completed on July 31, 2000. Removal of the field office trailer, security guard trailer, and sanitary facilities was completed on July 31, 2000.

Relocation/installation of the property line fence was initiated on July 25, 2000 but is not yet complete.

Security services were discontinued on July 31, 2000 at 4:30 p.m.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

September 6, 2000

PROGRESS REPORT FOR AUGUST, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - August 2000
Progress Report No.15

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending August 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of August 2000, KPR completed the following activities:

Airport's Stormwater Pipe Installation

As described in our previous monthly status reports, a tentative agreement has been reached to install a new stormwater pipe in lieu of the installation of the containment barrier designed with sealed checks to reduce the potential for oil migration within the bedding materials and will serve to convey stormwater past an area where oil seeps currently discharge to open channel flow. KPR has requested New Generation Consulting, the Gary Airport's engineering contractor to initiate design services. On August 23, 2000, an informal meeting was held with Mr. Kenneth Ross, P.E. of New Generation Consulting, KPR and U.S. EPA. KPR was provided a draft copy of the design drawings and construction specifications. KPR has provided a copy of these drawings and specifications to U.S. EPA for review and comment. As of the issuance of this monthly report, the draft review was incomplete. Upon the completion of the review and subsequent revisions, bids will be solicited for its installation. If the price

of the engineering and installation does not exceed $125,000.00, the culvert will be installed. If the cost is more than $125,000.00, additional discussions will be necessary.

Demobilization Activities

Relocation/installation of the property line fence was completed on August 4, 2000. Restricted area warning signs were placed at regular intervals on the outside of the property line fence on August 11, 2000.

The existing front entrance sign was removed on August 15, 2000.

A final site meeting was held on August 23, 2000.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

October 3, 2000

PROGRESS REPORT FOR SEPTEMBER, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - September 2000
Progress Report No.16

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending September 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of September 2000, KPR completed the following activities:

Airport's Stormwater Pipe Installation

As described in our previous monthly status reports, an agreement has been reached to install a new stormwater pipe in lieu of the installation of the containment barrier designed with sealed checks to reduce the potential for oil migration within the bedding materials and will serve to convey stormwater past an area where oil seeps currently discharge to open channel flow. On August 23, 2000, an informal meeting was held with Mr. Kenneth Ross, P.E. of New Generation Consulting, KPR and U.S. EPA. KPR was provided a draft copy of the design drawings and construction specifications. KPR has provided a copy of these drawings and specifications to U.S. EPA for review and comment. KPR received U.S. EPA's comments and conveyed the comments and suggestions to New Generation for incorporation into their design plans and specifications. The final design drawings are expected to be completed the week of October 2, 2000. Upon receipt of these plans, KPR will solicit bids for the

implementation of the work. Note that KPR and the legal committee representing the 6500 Industrial Highway Group will require a written modification to the approved Work Plan.

KPR has directed New Generation to obtain the necessary permits from the Federal Aviation Administration (FAA). The permit application was filed on September 1, 2000. According to Mr. Ken Ross of New Generation, the permitting process will require approximately six weeks to complete. In conjunction with this permitting effort, KPR has initiated the required security clearance process. KPR has completed the requisite applications and the security background checks are currently pending. As noted before, if the price of the engineering and installation does not exceed $125,000.00, the culvert will be installed. If the cost is more than $125,000.00, additional discussions will be necessary.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

November 7, 2000

PROGRESS REPORT FOR OCTOBER, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - October 2000
Progress Report No.17

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending October 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of October 2000, KPR completed the following activities:

Airport's Stormwater Pipe Installation

As described in our previous monthly status reports, an agreement has been reached to install a new stormwater pipe in lieu of the installation of the containment barrier. The new stormwater pipe is designed with sealed checks to reduce the potential for oil migration within the bedding materials and will serve to convey stormwater past an area where oil seeps currently discharge to open channel flow. Note that KPR and the legal committee representing the 6500 Industrial Highway Group will require a written approval of this modification to the Work Plan.

On August 23, 2000, an informal meeting was held with Mr. Kenneth Ross, P.E. of New Generation Consulting, U.S. EPA, and KPR. KPR was provided a draft copy of the design drawings and construction specifications. KPR has provided a copy of these drawings and specifications to U.S. EPA for review and comment. KPR received U.S.

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EPA's comments and conveyed the comments and suggestions to New Generation for incorporation into their design plans and specifications as prepared by New Generation. The final design drawings were completed and KPR solicited bids for the implementation of the work. U.S. EPA and KPR has noted that the design as presented by New Generation and as submitted within the bid documents may not be of adequate length as other seeps have discharged oil to the ditch further east. This may require further modifications to the length of the pipe. A meeting to review this is scheduled for November 2, 2000.

KPR has directed New Generation to obtain the necessary permits from the Federal Aviation Administration (FAA). The permit application was filed on September 1, 2000. A copy of FAA's permit approval letter was issued on October 20, 2000. A copy of this letter will be provided under separate transmittal. In conjunction with this permitting effort, KPR has initiated the required security clearance process. KPR has completed the requisite applications and the security background checks are currently pending.

As noted before, if the price of the engineering and installation does not exceed $125,000.00, the culvert will be installed. If the cost is more than $125,000.00, additional discussions will be necessary.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

December 12, 2000

PROGRESS REPORT FOR NOVEMBER, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - November 2000
Progress Report No.18

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending November 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of November 2000, KPR completed the following activities:

Airport's Stormwater Pipe Installation

As described in our previous monthly status reports, an agreement has been reached to install a new stormwater pipe in lieu of the installation of the containment barrier. The new stormwater pipe is designed with sealed checks to reduce the potential for oil migration within the bedding materials and will serve to convey stormwater past an area where oil seeps currently discharge to open channel flow. KPR and the legal committee representing the 6500 Industrial Highway Group will work jointly with your Agency to develop a written modification to the Work Plan.

At the preparation of this status report, KPR and the legal committee representing the 6500 Industrial Highway Group has received an amendment to the Administrative Order which, in effect, provides for the modification of the Work Plan as specified within the previously agreed to order.

KPR has solicited bids and has received quotations from local sewer contractors. The quotations received to date are in excess of the budgetary quotation furnished by Dyer Construction last Spring. As a result, KPR has contacted the PRP's technical committee to solicit their approval of the work. In addition, KPR has sought financial assistance from the Airport who has express some interest in the support of this project. The Airport board meeting is scheduled for December 13, 2000 where their contribution will be evaluated and determined.

CCCI Site Inspection - Damaged Cap

KPR performed a site inspection of the CCCI property on November 8, 2000. KPR noted that several monitoring wells had been installed. As a part of the construction of these monitoring wells, the earthen cover overlying the stabilized soils had been damaged by the drilling vehicles that were on-site. KPR also noted damage to off-site surfaces that were previously finish graded, seeded, and stable. This damage and recommended remedy were brought to your attention and the repair of these damaged areas will be performed by U.S. EPA when field conditions permit.

Should you have any questions concerning this report or the activities conducted, please do not hesitate to review them at our next progress meeting.

Respectfully submitted,

Krikau, Pyles, Rysiewicz and Associates, Inc.

Fred G. Krikau

Fred G. Krikau, P.E.
Principal

KRIKAU PYLES RYSIEWICZ AND ASSOCIATES, INC.

January 8, 2001

PROGRESS REPORT FOR DECEMBER, 2000

Mr. Steve Faryan, On Scene Coordinator
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

VIA U.S. MAIL

KPR Project No.17094

Re: Conservation Chemical Company of Illinois (Site), Gary, Indiana
Site Remediation - Monthly Progress Report - December 2000
Progress Report No.19

Mr. Faryan:

In accordance with the Administrative Consent Order for the above referenced site, the following is the monthly progress report for the month ending December 2000. Krikau, Pyles, Rysiewicz & Associates, Inc. (KPR), the 6500 Industrial Highway Group's contractor, initiated preliminary site work in June of 1999 and mobilized for on-site work in July of 1999. This report is a continuation of the chain of monthly progress reports since KPR started its project work in June of 1999.

During the month of December 2000, KPR performed the following activities:

Airport's Stormwater Pipe Installation

The amendment of the Administrative Order has been issued for final signature and will provide for the necessary modifications of the site's Work Plan. KPR has identified Reith Riley as its selected sewer contractor. As previously reported, the cost of this project is in excess of the established budget commitment. As a result, KPR has engaged in discussions with the Gary Airport officials to request their financial participation in this project. KPR's request was presented at the Gary Airport's Board of Directors meeting held on December 13, 2000. According to Mr. Ken Ross, the resident engineer, the board did not act upon our request and will address the request at their next meeting which is scheduled for January 17, 2001.

KPR anticipates that some level of participation will be provided by the Airport.